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Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PENDLETON DIVISION

DOUGLAS WILLIAMS,

Plaintiff,

vs.

GRANT COUNTY et al.,

Defendants.

NO. 2:15-cv-01760-SU

DECLARATION OF LYNN S.  
WALSH

I, Lynn S. Walsh, declare as follows pursuant to 28 USC § 1746:

1. I am the lawyer for plaintiff in the above-captioned matter. I have personal knowledge of the information contained in this declaration. If called upon to do so, I could and would competently testify regarding the matters set forth herein.
2. I previously filed a motion to withdraw (Docket #7) on December 28, 2015 due to being unable to find my client who had been recently released from prison.
3. The court denied the motion to withdraw on January 13, 2016 (Docket # 14).
4. Mr. Williams turned up at the Lane County Jail and called me on March 14, 2016. He

was to be released from jail within a couple of days. I informed him that he needed to call me once a week upon release. He also provided to me a cell phone number (for text messages only), and two addresses and phone numbers of people who “always know where he is.”

5. Mr. Williams failed to call me once a week. In fact, he did not call at all.
6. Once the Order (Docket #40) on the Motion to Dismiss was issued, I began to search for Mr. Williams. On September 19, 2016, I left a voicemail on his mother’s phone, I attempted to call his cell phone but was unable to leave a message, I texted his cell phone, and I was able to make contact with a friend in Cottage Grove. The friend told me she would give Mr. Williams the message to call me if she saw him. I also told the friend that I would be out of town on September 22 – 24, 2016.
7. Mr. Williams got the message from the friend, and left a voicemail on September 22, 2016. He stated that he was aware that I was out of town, and that he would call back. He did not call back. He did not leave any other contact information.
8. I called his friend again on September 29, 2016. She said she would try to contact Mr. Williams, although she sounded a bit annoyed with being bothered.
9. I did not hear from Mr. Williams, so I sent him a letter mailed to both his mother’s address and his friend’s address on October 13, 2016. I never heard from Mr. Williams.
10. In light of Mr. Williams’ persistent failure to keep me apprised as to his whereabouts, the logistical problems with this case have become insurmountable. I am therefore asking the Court to allow me to withdraw.
11. This motion is filed in good faith and not for the purposes of harassment or delay.
12. I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Executed on October 27, 2016.

/s/ Lynn S. Walsh  
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